

EXHIBIT D



United States Department of State

Washington, D.C. 20520

July 31, 2024

Ruby J. Krajick
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *Gladys Lopez, et al. v. Islamic Republic of Iran*, 1:23-cv-08305-GBD

Dear Ms. Krajick:

I am writing regarding the Court's request for transmittal of a Summons, Amended Complaint, Civil Cover Sheet, Related Case Statement, Notice to Conform to Consolidated Amended Complaint (Dkt. 10, September 28, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 11, September 28, 2023), Notice to Conform to Consolidated Amended Complaint (Dkt. 16, November 3, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 17, November 3, 2023), and Notice of Suit to the Government of the Islamic Republic of Iran pursuant to 28 U.S.C. Section 1608(a)(4) as a defendant in the above referenced lawsuit.

Because the United States does not maintain diplomatic relations with the Government of Iran, the Department of State is assisted by the Foreign Interests Section of the Embassy of Switzerland in Tehran in delivering these documents to the Iranian Ministry of Foreign Affairs. The documents were delivered to the Iranian Ministry of Foreign Affairs under cover of diplomatic note No. 1058-IE, dated June 12, 2024, and delivered on June 18, 2024. A certified copy of the diplomatic note is enclosed.*

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Hess", written over a light blue circular stamp.

Jared N. Hess
Attorney Adviser
Office of the Legal Adviser
L/CA/POG/GC

* Please note that performance by the Department of State of its statutory functions under 28 U.S.C. § 1608 should not be construed as an indication in any way of the United States' position or views on whether plaintiffs have properly complied with all statutory requirements of the FSIA, the status or character of a defendant, whether service was properly effected, or the merits of any claims or defenses. *See* <https://travel.state.gov/content/travel/en/legal/travel-legal-considerations/international-judicial-assistance/Service-of-Process/Foreign-Sovereign-Immunities-Act.html>.

Cc: Jerry S. Goldman
Anderson Kill P.C.
1251 Avenue of the Americas
New York, NY 10020

SPECIFIC AUTHENTICATION CERTIFICATE

federation of Switzerland)
n, Canton of Bern) SS:
assy of the United States of America)

ott M. Driskel, a consular officer at the Embassy of the United States at Bern,
erland, certify that this is a true copy of Embassy note number 28278 dated May
024, which was transmitted to the Swiss Ministry of Foreign Affairs on May 22,
, for further transmission to the American Interests Section of the Swiss Embassy in
an, Iran.



(Signature of Consular Officer)

Scott M. DRISKEL

(Typed name of Consular Officer)

Consul of the United States of America

(Title of Consular Officer)

July 11, 2024

(Date)





Embassy of the United States of America

May 17, 2024

CONS NO.

28278

Federal Department of Foreign Affairs
Foreign Interests Section
Kochergasse 10
Federal Palace North
Office #4.001
3003 Bern

Subject: JUDICIAL ASSISTANCE: Service of process under the Foreign Sovereign Immunities Act (FSIA) – Gladys Lopez, et al. v. Islamic Republic of Iran, 1:23-cv-08305-GBD

REF: ----

The Department of State has requested the delivery of the enclosed Summons, Amended Complaint, Civil Cover Sheet, Related Case Statement, Notice to Conform to Consolidated Amended Complaint (Dkt. 10, September 28, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or Ashton Sudan Amended Complaint (Dkt. 11, September 28, 2023), Notice to Conform to Consolidated Amended Complaint (Dkt. 16, November 3, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or Ashton Sudan Amended Complaint (Dkt. 17, November 3, 2023), and Notice of Suit to the Ministry of Foreign Affairs of the Islamic Republic of Iran pursuant to the Foreign Sovereign Immunities Act in the matter Gladys Lopez, et al. v. Islamic Republic of Iran, 1:23-cv-08305-GBD.

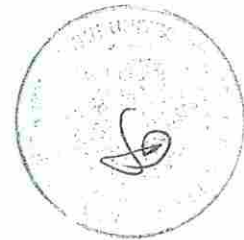
The Embassy is herewith requesting the Swiss Ministry of Foreign Affairs to transmit the documents to the American Interests Section of the Swiss Embassy in Tehran. There is one defendant to be served in this case: the Islamic Republic of Iran. The American Interests Section should transmit the Summons, Amended Complaint, Civil Cover Sheet, Related Case Statement, Notice to Conform to Consolidated Amended Complaint (Dkt. 10, September 28, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or Ashton Sudan Amended Complaint (Dkt. 11, September 28, 2023), Notice to Conform to Consolidated Amended Complaint (Dkt. 16, November 3, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or Ashton Sudan Amended Complaint (Dkt. 17, November 3, 2023), and Notice of Suit to the Iranian Ministry of Foreign Affairs under cover of one diplomatic note utilizing the language provided in the enclosed instructions.

Transmittal should be done in a manner which enables the Embassy to confirm delivery. The American Interests Section should execute certifications of the diplomatic notes, which will be forwarded by the Department of State to the requesting court in the United States.

Enclosed is one appropriate part of a message the Embassy received from the Department of State as well two sets of documents for each defendant.

The Embassy would appreciate being informed of the date the American Interests Section of the Swiss Embassy in Tehran receives the documents as well as the date the Interests Section forwards the documents to the Iranian authorities.

SPP's assistance is much appreciated.



BEGIN TEXT OF DIPLOMATIC NOTE REGARDING DEFENDANT ISLAMIC REPUBLIC OF IRAN:

The Embassy of Switzerland, Foreign Interests Section in Tehran refers the Ministry of Foreign Affairs of the Islamic Republic of Iran to the lawsuit ***Gladys Lopez, et al. v. Islamic Republic of Iran***, 1:23-cv-08305-GBD, which is pending in the United States District Court for the Southern District of New York. The Islamic Republic of Iran is a defendant in this case. The Foreign Interests Section transmits a Summons, Amended Complaint, Civil Cover Sheet, Related Case Statement, Notice to Conform to Consolidated Amended Complaint (Dkt. 10, September 28, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 11, September 28, 2023), Notice to Conform to Consolidated Amended Complaint (Dkt. 16, November 3, 2023), and Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 17, November 3, 2023) herewith. The U.S. District Court for the Southern District of New York has requested service of these documents. This note constitutes transmittal of these documents to the Government of the Islamic Republic of Iran as contemplated in Title 28, United States Code, Section 1608(a)(4).

Under applicable U.S. law a defendant in a lawsuit must file an answer to the Complaint or some other responsive pleading within 60 days of the date of transmittal of the Complaint, in this case the date of this note. Failing to do so, a defendant risks the possibility of having judgment entered against it without the opportunity to present arguments or evidence on its behalf. Therefore, the Foreign Interests Section requests that the Summons, Amended Complaint, Civil Cover Sheet, Related Case Statement, Notice to Conform to Consolidated Amended Complaint (Dkt. 10, September 28, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 11, September 28, 2023), Notice to Conform to Consolidated Amended Complaint (Dkt. 16, November 3, 2023), and Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 17, November 3, 2023) be forwarded to the appropriate authority of the Islamic Republic of Iran with a view towards taking whatever steps are necessary to avoid a default judgment.

In addition to the Summons, Amended Complaint, Civil Cover Sheet, Related Case Statement, Notice to Conform to Consolidated Amended Complaint (Dkt. 10, September 28, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 11, September 28, 2023), Notice to Conform to Consolidated Amended Complaint (Dkt. 16, November 3, 2023), and Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 17, November 3, 2023), the Foreign Interests Section is enclosing a Notice of Suit, prepared by the plaintiff, which summarizes the nature of the case and includes references to U.S. laws concerning suits.

The Foreign Interests Section has been advised that under U.S. law any jurisdictional or other defense including claims of sovereign immunity must be addressed to the court before which the matter is pending, for which reason it is advisable to consult an attorney in the United States. It is the practice of the U.S. Department of State to be available to discuss the requirements of U.S. law with counsel. The U.S. Government is not a party to this case and cannot represent other parties in this matter.

Attachments:

1. Summons, Amended Complaint, Civil Cover Sheet, Related Case Statement, Notice to Conform to Consolidated Amended Complaint (Dkt. 10, September 28, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 11, September 28, 2023), Notice to Conform to Consolidated Amended Complaint (Dkt. 16, November 3, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 17, November 3, 2023), and Notice of Suit
2. Translations

END TEXT OF DIPLOMATIC NOTE REGARDING DEFENDANT ISLAMIC REPUBLIC OF IRAN

SPECIFIC AUTHENTICATION CERTIFICATE

federation of Switzerland)
n, Canton of Bern) SS:
assy of the United States of America)

ify that the annexed document bears the genuine seal of the Swiss Federal
rtment of Foreign Affairs.

fy under penalty of perjury under the laws of the United States that the foregoing
e and correct.



(Signature of Consular Officer)

Scott M. DRISKEL

(Typed name of Consular Officer)

Consul of the United States of America

(Title of Consular Officer)

July 11, 2024

(Date)





Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Federal Department of Foreign Affairs FDFA

K.364-01-02-01-USA/IRAN

The Federal Department of Foreign Affairs presents its compliments to the Embassy of the United States of America and refers to Cons Note No. 28278 dated May 17, 2024 regarding judicial assistance and has the honor to convey following documents of the U.S. Interests Section of the Embassy of Switzerland in Tehran:

Judicial Assistance: Service of process under the Foreign Sovereign Immunities Act (FSIA) – Gladys Lopez, et al. v. Islamic Republic of Iran, 1:23-cv-08305-GBD

- Note No. 1058-IE addressed to the Islamic Republic of Iran

dated June 12, 2024 and proof of service, dated June 18, 2024 as well as the certification by the Swiss Federal Chancellery dated July 2, 2024.

The section has received the above mentioned documents on May 30, 2024. It has transmitted these to the Iranian Ministry of Foreign Affairs together with its diplomatic note on June 18, 2024. The reception of the mentioned documents was refused the same day by the Iranian Ministry of Foreign Affairs.

The Federal Department of Foreign Affairs avails itself of this opportunity to renew to the Embassy of United States of America the assurances of its highest consideration.

Bern, July 2, 2024

Enclosure(s) mentioned

To the
Embassy of the
United States of America

Bern



SPECIFIC AUTHENTICATION CERTIFICATE

Confederation of Switzerland)
in, Canton of Bern) SS:
Embassy of the United States of America)

I certify that the annexed document is executed by the genuine signature and seal of the
following named official who, in an official capacity, is empowered by the laws of
Switzerland to execute that document.

I certify under penalty of perjury under the laws of the United States that the foregoing
is true and correct.

Lara LORELLA

(Typed name of Official who executed the annexed document)



(Signature of Consular Officer)

Scott M. DRISKEL

(Typed name of Consular Officer)

Consul of the United States of America

(Title of Consular Officer)

July 11, 2024

(Date)





Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Embassy of Switzerland in Iran
Foreign Interests Section

No. 1058-IE

The Embassy of Switzerland, Foreign Interests Section in Tehran, presents its compliments to the Ministry of Foreign Affairs of the Islamic Republic of Iran, and has the honor to refer the Ministry to the lawsuit ***Gladys Lopez, et al. v. Islamic Republic of Iran***, 1:23-cv-08305-GBD, which is pending in the United States District Court for the Southern District of New York. The Islamic Republic of Iran is a defendant in this case. The Embassy transmits a Summons, Amended Complaint, Civil Cover Sheet, Related Case Statement, Notice to Conform to Consolidated Amended Complaint (Dkt. 10, September 28, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 11, September 28, 2023), Notice to Conform to Consolidated Amended Complaint (Dkt. 16, November 3, 2023), and Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 17, November 03, 2023), herewith. The U.S. District Court for the Southern District of New York has requested service of these documents. This note constitutes transmittal of these documents to the Government of the Islamic Republic of Iran as contemplated in Title 28, United States Code, Section 1608(a)(4).

Under applicable U.S. law, a defendant in a lawsuit must file an answer to the Complaint or some other responsive pleading within 60 days of the date of transmittal of the Complaint, in this case the date of this note. Failing to do so, a defendant risks the possibility of having judgment entered against it without the opportunity to present arguments or evidence on its behalf. Therefore, the Embassy requests that the enclosed Summons, Amended Complaint, Civil Cover Sheet, Related Case Statement, Notice to Conform to Consolidated Amended Complaint (Dkt. 10, September 28, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 11, September 28, 2023), Notice to Conform to Consolidated Amended Complaint (Dkt. 16, November 3, 2023), and Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 17, November 03, 2023) be forwarded to the appropriate authority of the Islamic Republic of Iran with a view towards taking whatever steps are necessary to avoid a default judgment.

In addition to the Summons, Amended Complaint, Civil Cover Sheet, Related Case Statement, Notice to Conform to Consolidated Amended Complaint (Dkt. 10, September 28, 2023), Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 11, September 28, 2023), Notice to Conform to Consolidated Amended Complaint (Dkt. 16, November 3, 2023), and Notice to Conform to Sudan Consolidated Amended Complaint or *Ashton* Sudan Amended Complaint (Dkt. 17, November 03, 2023), the Embassy is enclosing a Notice of Suit, prepared by the plaintiff, which summarizes the nature of the case and includes references to U.S. laws concerning suits.

The Embassy has been advised that under U.S. law any jurisdictional or other defense including claims of sovereign immunity must be addressed to the court before which the matter is pending, for which reason it is advisable to consult an attorney in the United States. It is the practice of the U.S. Department of State to be available to discuss the requirements of U.S. law with counsel. The U.S. Government is not a party to this case and cannot represent other parties in this matter.

The Embassy of Switzerland, Foreign Interests Section, avails itself of this opportunity to renew to the Ministry of Foreign Affairs of the Islamic Republic of Iran the assurances of its highest consideration.

Tehran – June 12, 2024



I, Pia Müller, Deputy Head of the Foreign Interests Section of the Embassy of Switzerland in Iran, certify herewith that this is a true copy of Diplomatic Note No. 1058-IE, dated June 12, 2024. The delivery of this note and its enclosures was attempted on June 18, 2024, but the Iranian Ministry of Foreign Affairs refused its acceptance.


Pia Müller
Deputy Head of the Foreign Interests Section

Tehran – June 18, 2024



APOSTILLE

(Convention de La Haye du 5 octobre 1961)

1. Country: SWISS CONFEDERATION

This public document

2. has been signed by Pia Müller

3. acting in the capacity of Deputy Head of the Foreign Interests Section

4. bears the seal/stamp of

Embassy of Switzerland US Interests Section, Tehran

Certified

5. at Berne

6. the 02 July 2024

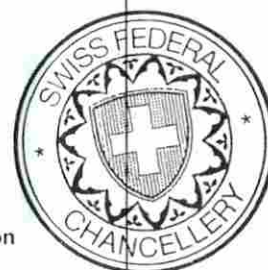
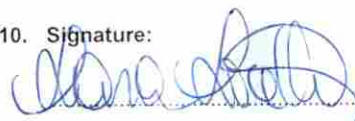
7. by Lara Lorella
functionary of the Swiss federal Chancellery

8. No 015078

9. Seal/stamp:

Swiss federal Chancellery

10. Signature:



ترجمه غیر رسمی

سفارت سوئیس
قسمت حافظ منافع خارجی

شماره IE-1058

سفارت سوئیس، قسمت حافظ منافع خارجی در تهران، ضمن اظهار تعارفات خود به وزارت امور خارجه جمهوری اسلامی ایران، احتراماً توجه آن وزارتخانه محترم را به دعوای حقوقی تحت عنوان گلا دیس لویز و دیگران علیه جمهوری اسلامی ایران، تحت پرونده مدنی شماره 1:23-cv-08305-GBD که در دادگاه منطقه ای ایالات متحده برای ناحیه جنوب نیو یورک مفتوح میباشد، جلب می نماید. جمهوری اسلامی ایران طرف خوانده در این پرونده می باشد. سفارت سوئیس بنا به درخواست دادگاه منطقه ای ایالات متحده برای ناحیه جنوب نیو یورک، یک فقره احضاریه، شکایت اصلاح شده، برگه جلد دادخواست مدنی، اظهارات پرونده های مرتبط، اطلاعیه برای مطابقت با شکایت اصلاح شده تلفیقی (سند شماره ۱۰ مورخه ۲۸ سپتامبر ۲۰۲۳)، اطلاعیه برای انطباق با شکایت اصلاح شده تلفیقی سودان یا شکایت اصلاح شده اشتون سودان (سند شماره ۱۱ مورخه ۲۸ سپتامبر ۲۰۲۳)، اطلاعیه برای مطابقت با شکایت اصلاح شده تلفیقی (سند شماره ۱۶ مورخه ۳ نوامبر ۲۰۲۳) و اطلاعیه برای انطباق با شکایت اصلاح شده تلفیقی سودان یا شکایت اصلاح شده اشتون سودان (سند شماره ۱۷ مورخه ۳ نوامبر ۲۰۲۳)، را ایفاد می دارد. برابر مقررات فصل ۲۸ بخش ۱۶۰۸ بند (الف)(۴) مجموعه قوانین ایالات متحده، این یادداشت به منزله ابلاغ مدارک مذکور به دولت جمهوری اسلامی ایران تلقی می گردد.

طبق قوانین قابل اجرا ایالات متحده، خوانده یک پرونده می بایست ظرف ۶۰ روز از تاریخ ابلاغ شکایت، در این مورد تاریخ یادداشت، پاسخی به شکایت یا دیگر پاسخی دفاعی در پرونده بگذارد. در غیر اینصورت، ممکن است حکمی بر ضد خوانده صادر گردد بدون آنکه خوانده فرصت ارائه شواهد و دفاعیه از طرف خود را داشته باشد. لذا، سفارت در خواست می نماید که احضاریه، شکایت اصلاح شده، برگه جلد دادخواست مدنی، اظهارات پرونده های مرتبط، اطلاعیه برای مطابقت با شکایت اصلاح شده تلفیقی (سند شماره ۱۰ مورخه ۲۸ سپتامبر ۲۰۲۳)، اطلاعیه برای انطباق با شکایت اصلاح شده تلفیقی سودان یا شکایت اصلاح شده اشتون سودان (سند شماره ۱۱ مورخه ۲۸ سپتامبر ۲۰۲۳)، اطلاعیه برای مطابقت با شکایت اصلاح شده تلفیقی (سند شماره ۱۶ مورخه ۳ نوامبر ۲۰۲۳) و اطلاعیه برای انطباق با شکایت اصلاح شده تلفیقی سودان یا شکایت اصلاح شده اشتون سودان (سند شماره ۱۷ مورخه ۳ نوامبر ۲۰۲۳) ضمیمه، با این دید که اقدامات لازم جهت جلوگیری از حکم قصور انجام شود، برای مقامات مربوطه ایرانی ارسال گردد.

سفارت علاوه بر احضاریه، شکایت اصلاح شده، برگه جلد دادخواست مدنی، اظهارات پرونده های مرتبط، اطلاعیه برای مطابقت با شکایت اصلاح شده تلفیقی (سند شماره ۱۰ مورخه ۲۸ سپتامبر ۲۰۲۳)، اطلاعیه برای انطباق با شکایت اصلاح شده تلفیقی سودان یا شکایت اصلاح شده اشتون سودان (سند شماره ۱۱ مورخه ۲۸ سپتامبر ۲۰۲۳)، اطلاعیه برای مطابقت با شکایت اصلاح شده تلفیقی (سند شماره ۱۶ مورخه ۳ نوامبر ۲۰۲۳) و اطلاعیه برای انطباق با شکایت اصلاح شده تلفیقی سودان یا شکایت اصلاح شده اشتون سودان (سند شماره ۱۷ مورخه ۳ نوامبر ۲۰۲۳)، ابلاغیه اقامه دعوی که توسط شاکی داور بر خلاصه ماهیت پرونده و مشتمل بر رونوشتی از مجموعه قوانین ایالات متحده آمریکا در خصوص دادخواست ها تهیه شده است، را به پیوست ایفاد می دارد.

سفارت بدینوسیله اشعار می دارد که بموجب قوانین ایالات متحده آمریکا، هر گونه دفاع مربوط به قلمرو قضائی و اداری و یا دفاع دیگری، از جمله عنوان نمودن مصونیت دولت ها، باید در مقابل دادگاهی صورت گیرد که موضوع در آن مفتوح می باشد. از این رو مشورت با یک مشاور حقوقی در ایالات متحده آمریکا توصیه می گردد. وزارت امور خارجه ایالات متحده آمریکا آماده گفتگو با مشاور در مورد قوانین مربوطه میباشد. دولت ایالات متحده آمریکا از طرفین این پرونده نبوده و نماینده هیچ یک از طرفین نخواهد بود.

سفارت سوئیس، قسمت حافظ منافع خارجی، موقع را مغتنم شمرده مراتب احترامات فائقه خود نسبت به وزارت امور خارجه جمهوری اسلامی ایران را تجدید می نماید.



تهران - بتاريخ بیست و سوم خرداد ماه ۱۴۰۳ (۱۲ ژوئن ۲۰۲۴)

پیوست: ۱- احضاریه، شکایت اصلاح شده، برگه جلد دادخواست مدنی، اظهارات پرونده های مرتبط، اطلاعیه برای مطابقت با شکایت اصلاح شده تلفیقی (سند شماره ۱۰ مورخه ۲۸ سپتامبر ۲۰۲۳)، اطلاعیه برای انطباق با شکایت اصلاح شده تلفیقی سودان یا شکایت اصلاح شده اشتون سودان (سند شماره ۱۱ مورخه ۲۸ سپتامبر ۲۰۲۳)، اطلاعیه برای مطابقت با شکایت اصلاح شده تلفیقی (سند شماره ۱۶ مورخه ۳ نوامبر ۲۰۲۳)، اطلاعیه برای انطباق با شکایت اصلاح شده تلفیقی سودان یا شکایت اصلاح شده اشتون سودان (سند شماره ۱۷ مورخه ۳ نوامبر ۲۰۲۳) و ابلاغیه اقامه دعوی
۲- ترجمه ها

اداره امور آمریکا
وزارت امور خارجه
جمهوری اسلامی ایران
تهران



U.S. Embassy

BERN, SWITZERLAND

<https://ch.usembassy.gov>

Customer: GLADY LOPEZ V. ISLAMIC
REP OF IRAN

Date: 5/17/2024 2:08:50 PM

Register: ACS Cash

Transaction: 15055331

Tender: U.S. Dollars

Exchange Rate: 1.00USD = 1.000LC

Handwritten signature

Qty	Svc	Ctry	Visa	Price
1	51			\$2,275.00
LETTERS				CHF 2'275.00
ROGATORY/FSIA FEE				

Balance	\$2,275.00
Amount Paid	\$2,275.00
Change	\$0.00

CUSTOMER COPY
ALL TRANSACTIONS ARE
FINAL - NO REFUNDS

Sensitive But Unclassified (SBU)

66806

